

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Administration of the
North American Numbering Plan
Carrier Identification Codes (CICs)

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CC Docket No. 92-237

PETITION FOR CLARIFICATION

BellSouth Corporation,¹ on behalf of its affiliated companies,² by counsel, files its Petition for Clarification of a limited portion of the Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking in the above-referenced docket.³

I. THE COMMISSION SHOULD CLARIFY THAT LOCAL EXCHANGE CARRIERS MAY ARRANGE FOR PHASED BLOCKING OF THREE DIGIT CICs BEGINNING JUNE 30, 1998.

In the CIC Reconsideration Order, the Commission modified its decision in the CICs Second Report and Order regarding the length of the transition during which three and four-digit Feature Group D CICs co-exist, and created a "two-step" end to the transition:

By January 1, 1998, the end of the first phase, all LECs that provide equal access must have completed switch changes to recognize four-digit CICs. The second

¹ BellSouth Corporation (BSC) is a publicly traded Georgia corporation that holds the stock of companies which offer local telephone service, provide advertising and publishing services, market and maintain stand-alone and fully integrated communications systems, and provide mobile communications and other network services world-wide.

² BellSouth Telecommunications, Inc., a Bell operating company providing wireline telephone exchange and exchange access service in parts of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee ("BST"), participated with BSC in the preparation of this Petition.

³ Administration of the North American Numbering Plan Carrier Identification Codes (CICs), CC Docket No. 92-237, *Order on Reconsideration, Order on Application for Review, And Second Further Notice of Proposed Rulemaking and Order* (October 22, 1997) ("CIC Reconsideration Order").

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phase, which ends on June 30, 1998, is intended to allow interexchange carriers (IXCs) time to prepare their networks for, and educate their customers about, the replacement of three-digit CICs by four-digit CICs. After that date, only four-digit CICs and seven digit CACs will be recognized. We also affirm our decision in the CICs Second Report and Order not to grandfather the use of three-digit CICs and five-digit CACs that are in use during the transition. After June 30, 1998, all CICs will be four digits in length.⁴

BST will have completed all changes necessary in its equal access switches to recognize four-digit CICs by January 1, 1998. However, blocking the use of three-digit CICs at these switches can only be accomplished in a phased manner, a process that BellSouth estimates will take two months.⁵ Thus, if it is the Commission's intent in the CIC Reconsideration Order to have "extended" the permissive dialing period established in the CICs Second Report and Order during which customers may dial either a four-digit or a three-digit CIC with the assurance that their call will complete, BellSouth will begin to block three-digit CICs beginning July 1, 1998. After July 1, 1998, four-digit CICs must be used in order to assure call completion. If a three-digit CIC is used, the call may or may not complete, depending on whether three-digit CIC blocking has been implemented in the particular central office to which the calls are routed. By September 1, 1998, three-digit blocking will have been implemented in all of BST's central offices and calls can only be routed if a four-digit CIC is used.

On the other hand, if it is the Commission's intent that absolutely no call complete using a three-digit CIC after July 1, 1998, then BellSouth must begin phasing in three-digit CIC blocking in its central office switches on May 1, 1998. The result will be that three-digit CIC dialing will no longer be "permissive" during the last two months of the second phase of the Commission's

⁴ CIC Reconsideration Order at ¶¶4, 20.

⁵ As a matter of engineering, three-digit CIC blocking cannot be flash-cut in each and every BST switch.

two-step transition. Rather, calls made using three-digit CICs may or may not complete, depending on whether the three-digit CIC blocking has been implemented in the central office to which the call is routed.

BellSouth believes that, notwithstanding language in the CIC Reconsideration Order stating that only four-digit CICs may be used after June 30, 1998, the Commission intended that three-digit CIC use remain permissive for all carriers and their customers throughout the entire period of the second phase of the two-step transition. Therefore, requiring phased implementation of three-digit CIC blocking during the second phase of the Commission's two-step transition order to assure that absolutely no three-digit CICs will be routed on July 1, 1998 would frustrate the permissive dialing period and complicate IXC efforts to educate customers on when four-digit CICs must be used. Customers who are advised that mandatory four-digit CIC dialing must begin July 1, 1998 will find that, after May 1, 1998, calls dialed using three-digit CICs may or may not complete.

On the other hand, if three-digit CIC blocking is allowed to be phased in over a two month period beginning July 1, 1998, the Commission's policy objectives as set out in this proceeding will be achieved. Customers can be notified that they have to use four-digit CICs beginning July 1, 1998. If a customer inadvertently dials a three-digit CIC, the call may complete if three-digit blocking has not yet been implemented in the particular central office pursuant to the LECs phased implementation schedule. But this result will only be temporary, during the phase-in period of three-digit CIC blocking. The benefits of uniform customer notification efforts outweigh the limited, arbitrary and temporary instances of three-digit CIC call completion that will occur after July 1, 1998, when mandatory four-digit CIC use begins.

BellSouth requests that the Commission clarify both that (1) BST may, consistent with the CIC Reconsideration Order, begin phased implementation of three-digit CIC blocking on July 1, 1998; and (2) BST may, consistent with the CIC Reconsideration Order, maintain effective tariffs for three-digit CIC call routing and charges occurring on or after July 1, 1998, to cover calls completed during the three-digit CIC blocking phased implementation period.

In the alternative, if it is the Commission's intent that absolutely no three-digit CICs be used after June 30, 1998, BellSouth requests that the Commission clarify that BST may, consistent with the CIC Reconsideration Order, begin phased implementation of three-digit CIC blocking within its central offices beginning May 1, 1998, that BST may block such calls without liability, and that IXCs must notify their customers that three-digit CICs may not be available in all parts of BST's service territory after May 1, 1998. BellSouth further requests that the Commission issue its clarification in time to allow BST to begin implementing three-digit CIC blocking in a manner that will comply with the Commission's intent.

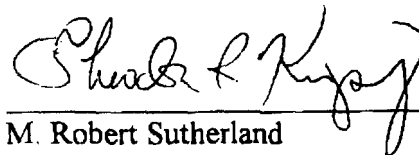
CONCLUSION

The Commission should clarify that, consistent with its CIC Reconsideration Order, LECs may begin phased implementation of three-digit CIC blocking beginning July 1, 1998.

Respectfully submitted,

BELLSOUTH CORPORATION

By:



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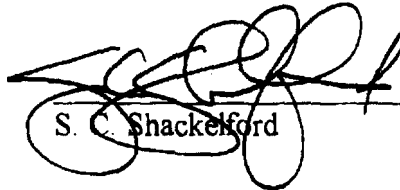
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DATE: November 26, 1997

CERTIFICATE OF SERVICE

I do hereby certify that I have this 26th day of November, 1997, served all parties to this action with a copy of the foregoing **BELLSOUTH COMMENTS** by placing a true and correct copy of same in the United States Mail, postage prepaid, addressed to the parties listed on the attached service list.



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